

REMARKS

The rejections of Claims 34-36, 42-44 and 48-65 as being anticipated by Scofield under 35 U.S.C. §102(b), of Claim 37 as being unpatentable over Scofield under 35 U.S.C. §103(a), of Claims 38-41 as being unpatentable over Scofield under 35 U.S.C. §103(a), and of Claims 45-47, 66 and 67 as being unpatentable over Scofield in view of Yamada et al under 35 U.S.C. §103(a), are each respectfully traversed. Reconsideration is requested in view of the newly submitted claims and the following comments.

Quite apart from what Scofield and/or Yamada et al teach, Applicants take issue with the unsupported assertion that it would have been obvious to use magnetic material in the Scofield device (rejection of Claim 37) without any reason for doing so absent Applicants' teachings. Likewise, they take issue with a similar unsubstantiated statement in rejecting Claims 38-41 that it would have been obvious to use the claimed combinations of material for the flywheel. Even if Applicants hadn't disclosed any stated problem or advantage -- and they also totally disagree about that -- the Office's burden remains to make a *prima facie* case. The alleged lack of a statement by an applicant does not constitute proof that supports a finding of obviousness.

Applicants have now defined their invention with regard to independent Claims 68, 92 and 99 so that the Patent and Trademark Office cannot assert either anticipation or obviousness. Nowhere does the prior art cited by Applicants or the Examiner teach or even suggest the flywheel configuration in

which, among other things, the magnetic material carries alternator flux, carry the magnets and provide flux distribution while that assembly also provides rotational inertia, thereby allowing for a highly compact generator system.

Nor does said prior art teach a flywheel that additionally functions as a cooling fan or blower (Claim 92) or in which an inner flywheel portion is the only structural member connecting the rotatable magnets and magnetic material while serving as a cooling fan or blower (Claim 99). And the features set forth in the dependent claims likewise define separately patentable combinations notwithstanding that individual features per se in those claims may have been known prior to Applicants' invention.

For the foregoing reasons, early and favorable action is now earnestly solicited. If the Examiner deems any issues to remain outstanding, Applicant's undersigned representative would invite a personal interview with the Examiner prior to issuance of any further written action if that would advance prosecution of this case.

If there are any questions regarding this response or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and

Serial No. 10/649,793
Amendment Dated: October 29, 2009
Reply to Office Action Mailed: September 14, 2009
Attorney Docket No. 029211.52672US

please charge any deficiency in fees or credit any overpayments to Deposit

Account No. 05-1323 (Docket #029211.52672US).

October 29, 2009

Respectfully submitted,



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